



July 19, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn D. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29211

Re: Dominion Energy South Carolina, Incorporated's 2021 Avoided Cost
Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)
Docket No. 2021-88-E

Dear Ms. Boyd:

On behalf of Dominion Energy South Carolina, Inc. ("DESC") and in response to Order No. 2021-488 issued by the Public Service Commission of South Carolina ("Commission") in the above-referenced docket, DESC submits the following questions to the Commission for its consideration as it conducts interviews of potential third-party consultants and experts.

1. Have you now or at any time represented or been retained to perform any services on behalf of any of the parties in Docket No. 2021-88-E? If so, please identify the party that retained you and explain the purpose for which you were hired.
2. Have you now or at any time represented or been retained to perform any services against any of the parties in Docket No. 2021-88-E? If so, please identify the party you opposed and explain the purpose for which you were hired.
3. Have you previously been engaged or retained by any state or federal regulatory commission to serve as an independent consultant or advisor under terms similar to the proposed engagement here? If so, please identify

the proceeding, including the subject matter, and the terms of your engagements.

4. Have you previously testified in any proceeding before the Commission or any other state or federal commission? If so, please identify the proceeding, the party on whose behalf you testified, and the subject matter of your testimony. Also please note specifically if those proceedings involved testimony on PURPA and avoided costs.
 - a. Dr. Johnson, it is our understanding that you testified on behalf of the South Carolina Solar Business Alliance and against Dominion Energy South Carolina, Inc. f/k/a South Carolina Electric & Gas Company in Docket No. 2018-2-E. We understand that the purpose of your testimony in that proceeding was to provide testimony against DESC on the subject of PURPA, the Company's avoided cost calculations, and proposed changes to the then-existing Rate PR-2. You expressly couched your testimony in terms of the investments in solar generating facilities by members of SCSBA who are "Independent Power Producers that sell the output of their facilities to incumbent utilities like Duke Energy and SCE&G in the generation of electricity under PURPA." You also noted that, "Depending on the economic success or failure of these initial investments, the extent of future needs for generation, and the state's regulatory and competitive climate, these firms are likely to make additional investments in future years." Is our understanding correct? Please explain whether you have any continuing relationship with the SCSBA or any of these same Independent Power Producers, and how you can be an independent advisor and consultant for the Commission when you have previously advocated on behalf of these independent solar producers.
 - b. Power Advisory, you were selected as the Commission's advisor in the last avoided cost docket for DESC. In that docket, you staked out certain positions regarding the Company and transparency. What can you do to ensure us that you will look at this docket freshly and not be wedded to the positions or views that you developed in the prior avoided cost proceedings?

- c. Ascend Analytics, we understand that you describe yourself as an “innovative software service company focused on energy analytics.” How do you propose to employ software in your work for the Commission if you are engaged in this matter, and what advantage will that give you over the other bidders?
 - d. London Economics International, we understand that you employ a number of analytical tools in your professional services. How do you propose to employ those tools if you are engaged in this matter, and what advantage will that give you over the other bidders.
5. For the work that you perform today, what percentage of your work is done on behalf of utilities? On behalf of consumer advocates? On behalf of solar developers and environmentalists? On behalf of other industry?
6. Do you have any experience in evaluating avoided cost methodologies and calculating avoided cost rates? If so, please explain.

Thank you for allowing the parties to submit proposed questions and your consideration of this matter. If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



K. Chad Burgess

KCB/tmh

cc: Carri Grube Lybarker, Esquire
Christopher M. Huber, Esquire
Conor J. Parker, Esquire
Courtney E. Walsh, Esquire
Emma C. Clancy
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Richard L. Whitt, Esquire
Roger P. Hall, Esquire
Weston Adams III, Esquire
(via electronic and U.S. Mail)